10/18/93

FAIR HOUSING AUDIT REPORT

1994 - 1995

COVERING: UNINCORPORATED SOUTHERN ALAMEDA COUNTY, HAYWARD, NEWARK, UNION CITY AND DUBLIN

Prepared and submitted by:

THE EDEN COUNCIL FOR HOPE AND OPPORTUNITY

INSTITUTE OF GOVERNMENTAL STUDIES LIBRARY

MAY 20 1996

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EXECUTIVE SUMMARY

The federal Fair Housing Amendments Act, the state Fair Employment and Housing Act and state Unruh Civil Rights Act prohibit discrimination in the sale or rental of housing. The federal legislation protects persons from discrimination based on race, color, national origin, sex, religion, physical or mental handicap and familial status. California statutes prohibit discrimination based on sex, sexual orientation, race, color, religion, familial status, ancestry, marital status, national origin, mental or physical handicap, age and any other arbitrary reason.

Despite the presence of strong enforceable laws, discrimination continues to be a problem in our community. The Eden Council for Hope and Opportunity (ECHO) is committed to ending illegal discrimination in housing. To affirm its commitment to ending housing discrimination, ECHO conducted a housing audit in southern Alameda County, including the cities of Hayward, Union City, Castro Valley, Newark, Dublin, San Lorenzo, and Unincorporated San Leandro. The audit attempted to measure the level of discrimination experienced by persons of color in initial interviews with prospective landlords.

A total of thirty-one properties county-wide were tested over a one month period. Thirteen agents (property managers, owners or leasing agents) (42%) treated the majority (white) tester more favorably than the minority (black) tester.

ECHO will attempt to reduce the level of discrimination through education. The owners and managers of the properties, where evidence of differential treatment was found, will be invited to and encouraged to participate in fair housing training seminars and workshops offered throughout the year. Furthermore, ECHO will send out information packets regarding the fair housing legislation that has been codified into law. Education and enforcement must be priorities in the fight to end illegal discrimination. ECHO is committed to ensuring that all people have safe and affordable housing.

INTRODUCTION

The Eden Council for Hope and Opportunity, ECHO, was founded in 1964 and incorporated in 1965. ECHO is a publicly supported non-profit housing counseling agency established to serve the housing needs of low to moderate income residents in southern Alameda County. ECHO's comprehensive housing counseling includes an extensive fair housing program. The program is designed to promote equal access to housing opportunities through education, investigation, conciliation, training and, when necessary, litigation. The primary focus is on community outreach, education and training regarding civil rights issues as they apply to housing.

Client services include counseling, investigation of complaints, conciliation services and litigation referrals. ECHO maintains a referral list of attorneys who specialize in fair housing and civil rights law. Upon a client's request, ECHO will refer clients to these attorneys on a rotating basis. Clients may also choose to pursue their complaints with the United States Department of Housing and Urban Development (HUD) and, or the California Department of Fair Employment and Housing (DFEH).

During the fiscal year 1994 - 1995, ECHO conducted an audit of rental properties in areas served under contract with Alameda County, and the cities of Hayward and Union City. Every year, a steering committee is established to discuss and determine which characteristic the agency will test for in the educational audit. This year's committee consisted of representatives from Alameda County, the cities of Hayward and Union City, the Rental Housing Owners' Association, as well as members of ECHO's Fair Housing Program and Administration.

The steering committee determined that the focus of this year's audit should be to test rental units in southern Alameda County to determine if prospective tenants were being treated differently based on race or color. ECHO has received numerous complaints of race discrimination over the years. The majority of the complainants were from persons of African-American or perceived African-American descent. There are various forms of discrimination that people of color encounter; outright denial of acceptance by refusal to give an application, imposition of stricter standards to qualify ie. income to rent ratio used, denial of a vacancy when one exists, and demanding extensive verification of employment, bank accounts, income, previous addresses as a way of discouraging minority applicants, are the most prevalent forms of discrimination based on race or color.

ECHO hopes that through time, public education and progressive legislation people of color will come forth when they encounter discrimination and, that ultimately, discriminatory practices will be eliminated.

AUDIT RATIONALE

Auditing is undertaken in order to evaluate the housing industry's treatment of persons protected under federal and state fair housing laws. Auditing is an investigative process conducted by trained testers. Testers report back their experiences posing as bona fide homeseekers with respect to quality, quantity and content of services that were offered by rental agents to them. A comparison analysis of audit results is done by the fair housing staff to determine if differential treatment has occurred concerning the protected characteristic. Auditing is an objective process used to discover whether patterns of illegal rental practices are present in a designated area. The audit results are the basis for providing fair housing education to owners and managers, with the goal of ensuring that equal housing opportunities are available to all persons.

LEGAL BACKGROUND

ECHO's fair housing efforts are guided by both federal and state civil rights legislation. The federal Fair Housing Amendments Act of 1988 prohibits discrimination in housing based on race, color, national origin, sex, physical or mental disability and familial status. The state fair housing laws include the Unruh Civil Rights Act (1959), the Rumford Fair Housing Act (1963) and the Fair Employment and Housing Act (1992) which prohibit discrimination based on race, color, religion, sex, age, ancestry, marital status, sexual orientation, familial status, mental or physical disability and any other arbitrary class-based reason.

Several approaches can be taken to deal with discriminatory housing practices. Often a person with a complaint contacts a local fair housing agency. The fair housing agency will conduct either a telephone or site investigation to determine objectively if illegal discrimination is occurring. A person has the right to file his or her case with a government enforcement agency or with a private attorney.

Another method of combatting illegal housing discrimination is through educational auditing. Auditing is a tool used to measure the effectiveness of federal and state fair housing laws and to determine if illegal patterns and

practices are employed in the rental housing industry. Although most audits are educational in nature, the audit findings can be referred for litigation (United States vs. Youritan Construction Co., 1973; Havens Realty Corporation vs. Coleman, 1982.) This is more often the case when patterns and practices of discrimination have become entrenched and the property owner is uncooperative and, or resistant to the educational process.

METHODOLOGY

Testers

ECHO maintains a pool of trained testers who are used to investigate complaints of discrimination. The testers who were employed for the audit were selected from this pool. All of the testers have completed a formal training session with ECHO or another Fair Housing agency in the Bay Area. These sessions include detailed information about Fair Housing laws, the principles of testing, testing techniques, and how to use the report forms, in addition to a practice test in which the tester's performance is monitored and critiqued.

Before each site visit ECHO staff reminded the testers that the purpose of the test is to objectively report the landlord's normal business practices and procedures. Testers were instructed to ask only necessary questions and volunteer only requested information. The testers should give the agents a chance to show how they treat prospective tenants. In other words, the testers should let the agents "sell" them the apartment. In no instance should the tester enter the test with the assumption that the landlord discriminates. ECHO staff also reminded the testers to discuss the test only with the staff person who would debrief them and to keep all information involved in the audit confidential.

Site Selection

A total of thirty-one sites were tested in this year's audit: twenty in areas served under the Alameda County contract, five in the City of Hayward (specifically properties which had been partially subsidized by the city through bond programs) and six in the City of Union City. In most cases, addresses of available rental units were obtained by responding to classified advertisements that appeared in the Argus/Daily Review in the days immediately preceding the date of testing. Advertisements were selected randomly and then called to verify the availability of units and whether or not someone would be available to show the unit or units on the day of the test. In the instances where the newspaper did not yield enough sites for a

given area, the audit supervisors obtained addresses from <u>For Rent</u> magazine or randomly called complexes listed in the yellow pages under "apartments."

With the Hayward exception previously described, an effort was made to include smaller complexes as well as larger apartment complexes in the audit. Due to the logistics of audit testing and the need to have testers complete various tests on a single day, however, a large majority of the properties tested were large complexes with an on-site manager.

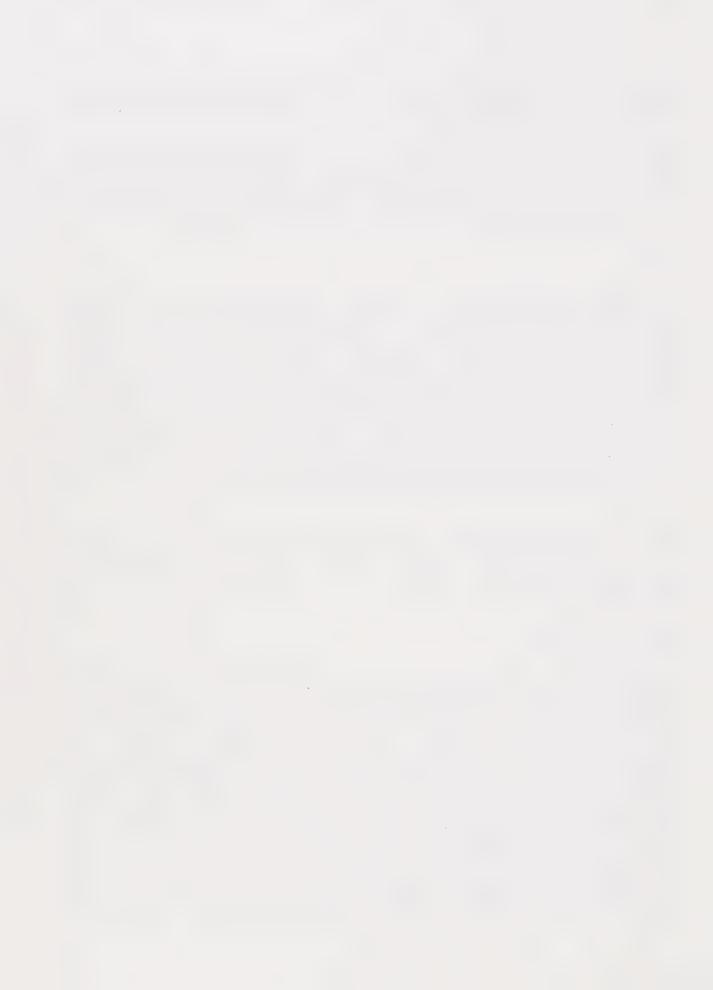
Profiles

The audit survey followed the standardized format of a controlled experiment. Each of the units was tested by a two-person test team. Testers were matched closely except for the variables being tested. All participating testers were married with no children in order to prevent any possible discrimination based on marital status or the presence of children. Both testers were qualified financially based on information gathered by the fair housing counselors. Information obtained included: monthly income to rent ratio required by the complex (usually 3 times income to rent required), the number and types of units available and rental amounts. ECHO staff then provided the testers with all information regarding occupation, income, current place of residence and reason for moving.

Testers were instructed what bedroom size to request and to always volunteer who would be occupying the unit. It was expected that given these controls, differential treatment between testers could be attributed to the dissimilar factors - discrimination.

Conducting The Test

In most cases, on the day preceding each of the tests one of the supervisors called the manager to verify that he or she would be at the complex on the following day. When a smaller property was involved, the supervisors had the testers make an appointment. The testers were assigned their respective profiles and reminded of testing procedures before driving to the site. The minority tester always visited first in order to preclude the majority tester from having any first right to an available unit. The majority tester followed shortly after the first visit had ended. Both testers were instructed to inquire about the same type of apartments and not to volunteer any information which falls outside their profiles or instructions even if requested by the agent. After the interviews, each tester independently completed a Test Report Form (see appendix) and returned to the office to be debriefed by one of the fair housing counselors. One counselor debriefed



each member of a test pair, checking over the report form for completeness and accuracy, and recorded the information on the Test Comparison Form (see appendix).

Evaluation

Following the debriefing, the audit counselor compared the information obtained from each member of a test pair and recorded the data on the Test Comparison Form. Differences were sought in each of the following categories:

- (1) <u>Length of interview and person spoken to</u>. It is important to know whether or not the testers spoke with the same agent in order to rule out the possibility that a difference in treatment could be attributed to a difference in the amount of information available to the agent.
- (2) <u>Availability of units</u>. A comparison was made on the number of units that were made available to each tester. These included units that were available now as well as those that would become available in the near future. In addition, the availability date quoted to the testers for each available apartment was compared.
- (3) <u>Number and location of units inspected</u>. The number of units that each tester was invited to inspect was compared.
- (4) <u>Rental terms and conditions</u>. This category includes information quoted to the testers regarding the rental price of any available units, the amount required as security deposit, and the price of any application or credit check fee.
- (5) <u>Information and encouragement</u>. Counselors looked under this heading for any type of discouraging or discriminatory comments that may have been made to either tester, or any other major differences in the information that was given out or the attitudes expressed by the agent. In particular, it was noted what type of information was given to each tester about waiting lists, and whether or not the tester received an application from the agent.



Based on the comparisons made from the criteria above, the audit counselors gave each test one of the following ratings:

- (1) No evidence of prejudicial treatment towards African-Americans. These were tests in which both testers were given identical information and treatment or in which there were discrepancies that did not seem to put the minority tester at a disadvantage to rent.
- (2) Evidence of prejudicial treatment towards African-Americans. This rating was given to tests in which the agent treated the majority tester more favorably than the minority tester. These tests show that discriminatory practices in violation of state and federal Fair Housing laws may be in effect.
- (3) <u>Inconclusive results</u>. Tests were considered inconclusive if there were differences in treatment prejudicial to the minority tester but the testers saw different rental agents, if there were differences in treatment prejudicial to the majority tester, if one of the testers made an error such as requesting apartments of different sizes, or if there were differences in the information given out that could not be judged to favor one tester over the other.

RESULTS

Thirty-one properties were tested in this year's audit. In thirteen (42%) of the tests there were differences that seemed to put the minority tester (African-American) at a disadvantage to rent the apartment. The differences in this audit were primarily ones that could be uncovered only through paired testing. Testers were given different amounts or other clearly conflicting information about the availability of units and the terms of rental. In some cases, the minority testers were not given the same encouragement to apply as the majority testers (caucasian) were. The percentages of tests that fell into this category was significantly lower than the average for this audit in the City of Hayward (0%), somewhat higher than average for the unincorporated areas of southern Alameda County (50%), and slightly lower than average in the City of Union City(33%).

Only three of the thirty-one tests (10%) were given a rating of "Inconclusive." These differences did not clearly put the minority testers at a disadvantage overall. A few of these were tests in which there were testing errors made. Some others were tests in which minority testers were at a disadvantage, but the testers saw different rental agents. Still others put the minority tester at an advantage over the majority tester.

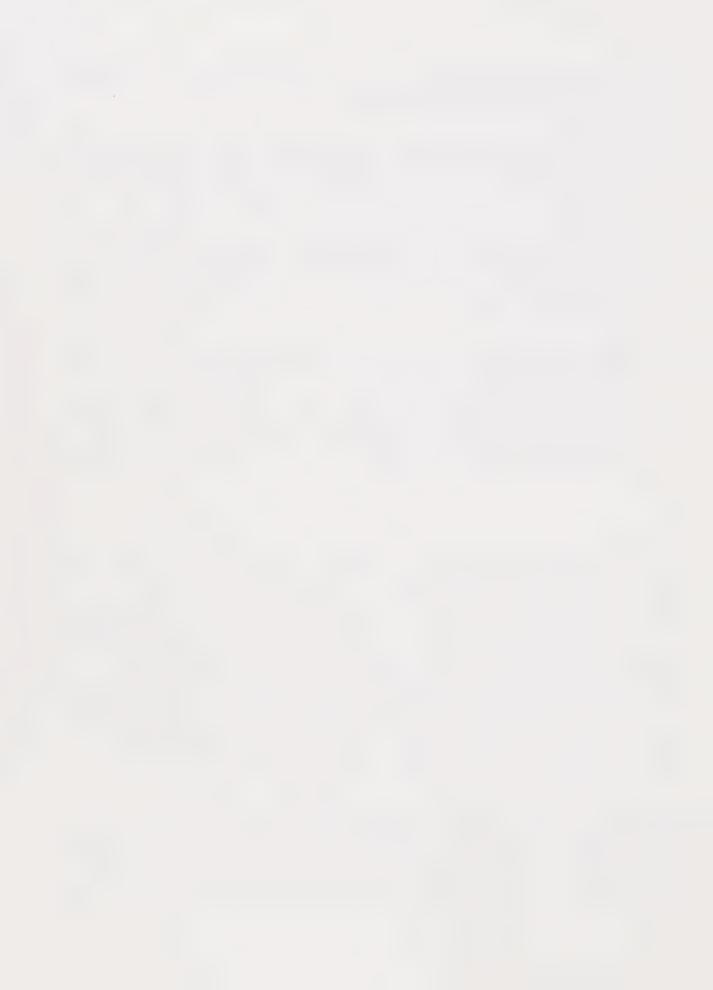


Table 1
Summary of Discrimination against people of color by Category of Treatment and Jurisdiction

Rating Prejud

Jurisdiction		udicial atment		rejudicial atment	Incon	ıclusive
All Jurisdictions	13	(42%)	15	(48%)	3	(10%)
Hayward	0	(0%)	3	(60%)	2	(40%)
Union City	3	(50%)	2	(33%)	1	(17%)
Southern Alameda County	10	(50%)	10	(50%)	0	(0%)
Castro Valley	3	(43%)	4	(57%)	0	(0%)
Newark	2	(67%)	1	(33%)	0	(0%)
Dublin	2	(100%)	0	(0%)	0	(0%)
San Lorenzo	0	(0%)	2	(100%)	0	(0%)
Unincorporated San Leandro	3	(50%)	3	(50%)	0	(0%)

DISCRIMINATION BY TYPE

As mentioned above, the prejudicial differences in treatment that the minority testers (African-Americans) encountered in this audit were, for the most part, never overt. Instead, they were differences revealed only when compared to the experience of majority testers (caucasians) with the same rental agents. We have broken down the acts of discrimination into four categories and provide examples below.

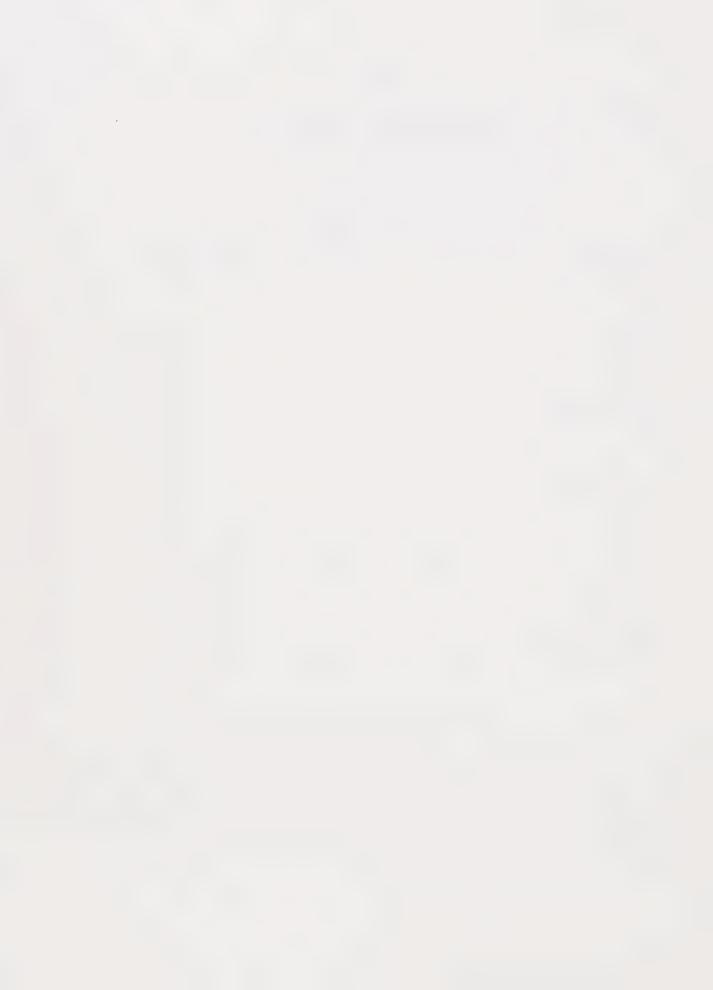


Table 2

Breakdown of Incidents of Discrimination by Type

Type of Discrimination	Numbers of Incidents
Fewer units available to rent	6
Fewer or different units available for in	spection 8
Less favorable rental terms	6
Less encouragement to apply	6

1. Fewer units available to rent

In six instances, the minority tester was shown fewer units than the majority tester. Even though testers visited the complex within at the most a half an hour of each other, they were not always given the same information about available rentals. In four instances, the minority tester was told that there was one two-bedroom unit available and the majority tester was told that two or more two-bedroom units were available. In one instance, the minority tester was told that there were simply no units available. Whereas, the same agent told the majority tester that a unit would be coming up at a future date and to call back at a later date. In another instance, the minority tester was not told about any one bedroom units (which were lower in cost), while the majority tester was told that two of these lower cost units were available immediately. Note that both testers asked to see both one and two-bedroom units.

2. Fewer or different units available for inspection

In this category we found the most incidents of discrimination. In eight instances, the minority tester was shown or advised of fewer or different units than the majority tester was. In some cases the date of availability of additional units was given to the majority tester and not to the minority tester.

In one case the majority tester was given the agent's business card and told to call regarding possible future openings but the same agent told the minority tester that there were no openings and that the agent was out of business cards. On another occasion the majority tester was offered a choice



of viewing either an upstairs or downstairs unit- that same agent also advised the majority tester of two other potential future units. The minority was offered no choices.

3. Rental Terms and Conditions

In one case the majority tester was offered a discount of \$100 off the first month's rent, while the minority tester was not. In another case the minority tester was given a flat amount for deposit, while the majority tester was informed that the one bedroom unit has a lower deposit required. In another situation the minority tester was shown a unit which had a higher rent amount. That same agent also told the majority tester about a "paid waiting list" which would give the majority tester priority for future openings. The minority tester was not given that information and opportunity. In yet another case, the testers were shown different units and the majority tester was told that the credit check was not rigid while the minority tester was not told this. In the final case, the majority tester was told of a discount for timely payment of rent while the minority tester was not.

4. Information and Encouragement

While there are often subjective differences in treatment that get reported by testers, only objective differences get counted in this category. At one complex, for example, the minority tester was told that there were no vacancies. The majority tester, however, was told that while there were no current vacancies there was an anticipated vacancy by a certain date and gave the tester the agent's business card to call back. In another case the minority tester was advised of possible future vacancies - the majority tester was give a definite future date of availability. That same agent used the nearby trains as a discouragement to the minority tester but played down the train noise to the majority tester. As mentioned in a prior category one agent provided the majority tester with information regarding a "paid" waiting priority list, and another agent gave info regarding an timely rental payment discount to the majority tester. These "special deals" were not shared with the minority testers. One area was not as revealing as one might expect; that is - the amount of time spent with each tester. In only one case the majority tester spent 10 minutes longer with the agent than the minority tester.



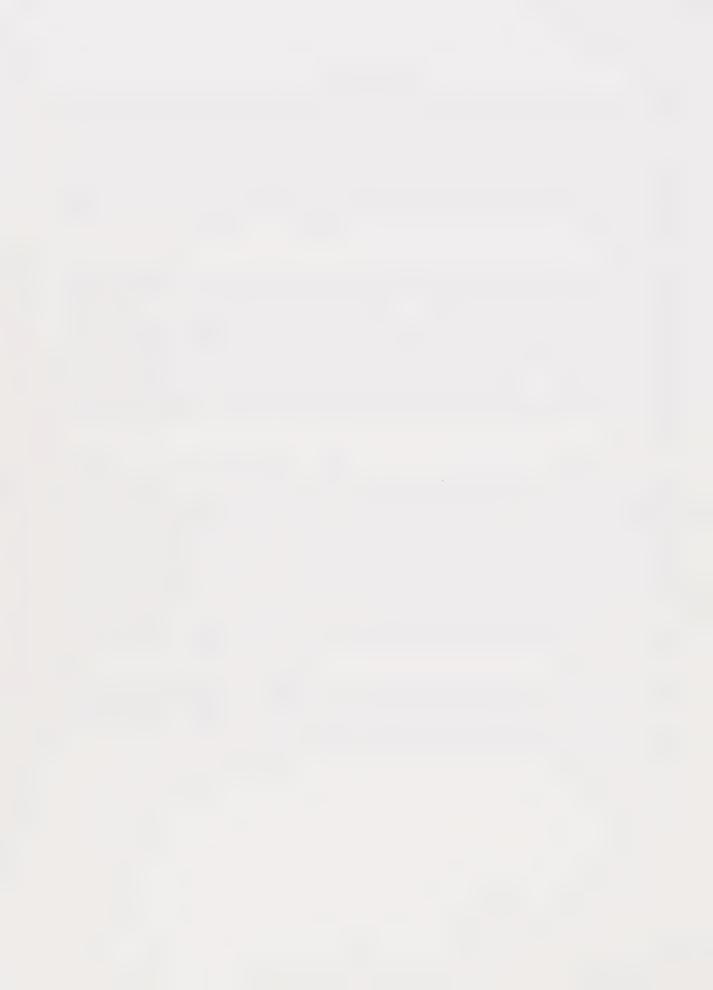
CONCLUSIONS

The audit clearly reflects that incidences of differential treatment indicating discrimination against people of color are disturbingly high at 42% overall. Moreover, looking at the summary on page 8, the results for certain cities become extremely alarming with up to 100% of the tests showing discriminatory practices in the city of Dublin. Even though this must be viewed with caution because the sample is so small the audit results do reveal that EHCO has much work to do with regard to racial discrimination in housing.

We at ECHO, along with sister agencies throughout Northern California with whom our counselors maintain contact, have noticed that some agents and/or landlords have developed quite sophisticated methods for excluding people from equal access to housing. We rarely see blatant discriminatory statements expressed to complainants or testers. What we do see, and what this audit reflects, are patterns and practices of different behavior toward minority persons. This treatment can be so subtle as to be undetectable. One such practice is to be "out of business cards" when a minority person comes in.

Unless a comparative test is done, such subtle techniques as are cited in this report might go completely undetected by the applicants who are being egregiously affected. Therefore this audit, while informing our funders as to the need for our fair housing program, also serves as an important learning tool for ECHO. It reveals to our counselors ways that discrimination may be implemented without detection by an unknowing victim. Many times we get calls from persons who feel that the have been discriminated against but the have no actual evidence. It is often just a "feeling". The counselor then knows how to set up a test to bring such subtle differential treatment to light and to prepare our testers to be able to detect the undetectable.

This audit then does more than give us numbers or percentages which indicate how much discrimination in housing exists in what area. It allows ECHO to discover and then combat the newest methods created by those who would deny equal access to housing in the South County.



THE NEXT STEP

ECHO Housing will be following up this audit with an educational campaign directed at the owners and managers involved in this audit. We feel that it is important for the owners and managers of rental property to receive feedback regarding their performance in the audit and to receive information and training regarding fair housing laws. In this way we make landlords aware of the law and the possible repercussions for violations. We let them know that ECHO is here and willing to assist and provide training for them and their staff so they can avoid fair housing complaints. Additionally, of course, it puts them on notice that any applicant may well be a tester for ECHO and that will hopefully insure fair treatment for all potential tenants.

Each of the owners of the properties involved in this audit will be contacted by mail and given a report on the performance of their agents. The owners will be encouraged to meet with ECHO's Fair Housing Counselors to discuss the findings at their property and, in cases where differential treatment was found, to discuss possible changes that could be made to bring their rental policies and practices in line with federal and state Fair Housing laws. The owners will also be encouraged to schedule a Fair Housing training session for themselves and their managers. These sessions are offered by ECHO's counselors at no charge to the owners.

ECHO will also continue its general education campaign within the community, informing homeseekers that they are legally protected from housing discrimination, and working with housing providers to make sure that we can prevent acts of illegal discrimination against persons in all the protected classes. ECHO is committed to assuring everyone a fair opportunity to meet their housing needs.



SUMMARY OF AUDIT TEST RESULTS

Key to summary of audit test results

Letter indicates the city in which the tested property is located:

H Hayward
UC Union City
CV Castro Valley
N Newark
D Dublin

SL San Lorenzo

UNSL Unincorporated San Leandro

"Minority tester": African-American (black) tester.

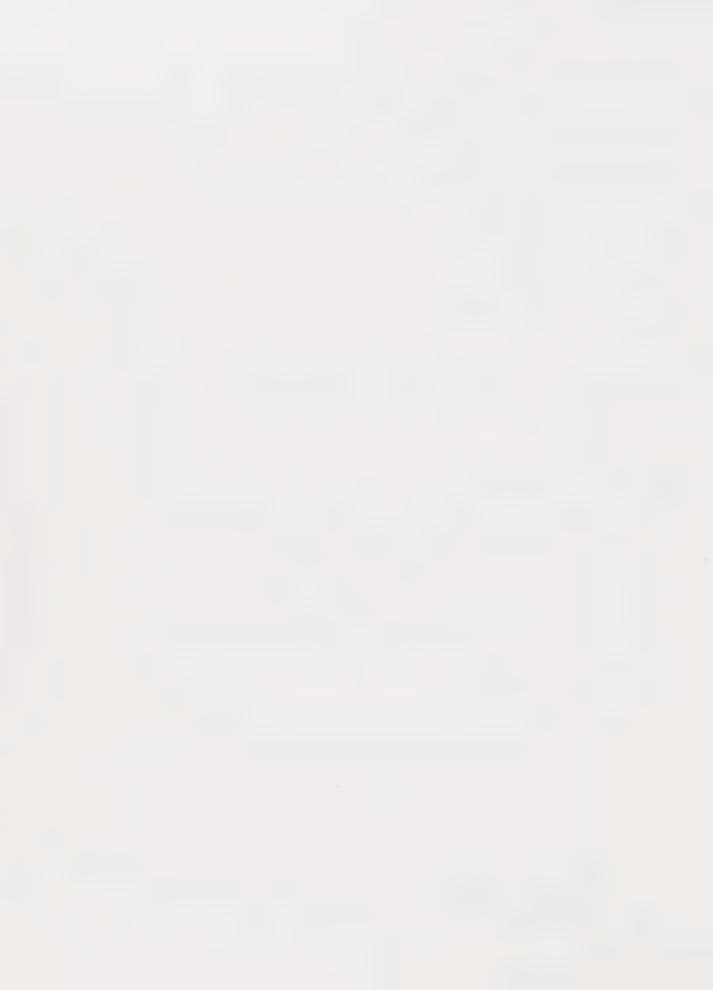
"Majority tester": Caucasian (white) tester.

<u>Code</u> <u>Findings</u>

H-1 Inconclusive. Minority tester forgot to record time departed and number of units shown. However, the black tester was told unit was available now, while the white tester was given a future date 17 days from date shown. Also, black tester was given option of holding unit for one day to discuss with husband without holding deposit whereas white tester was only told that could hold with a deposit of \$150. Bias appeared to be in favor of minority tester.

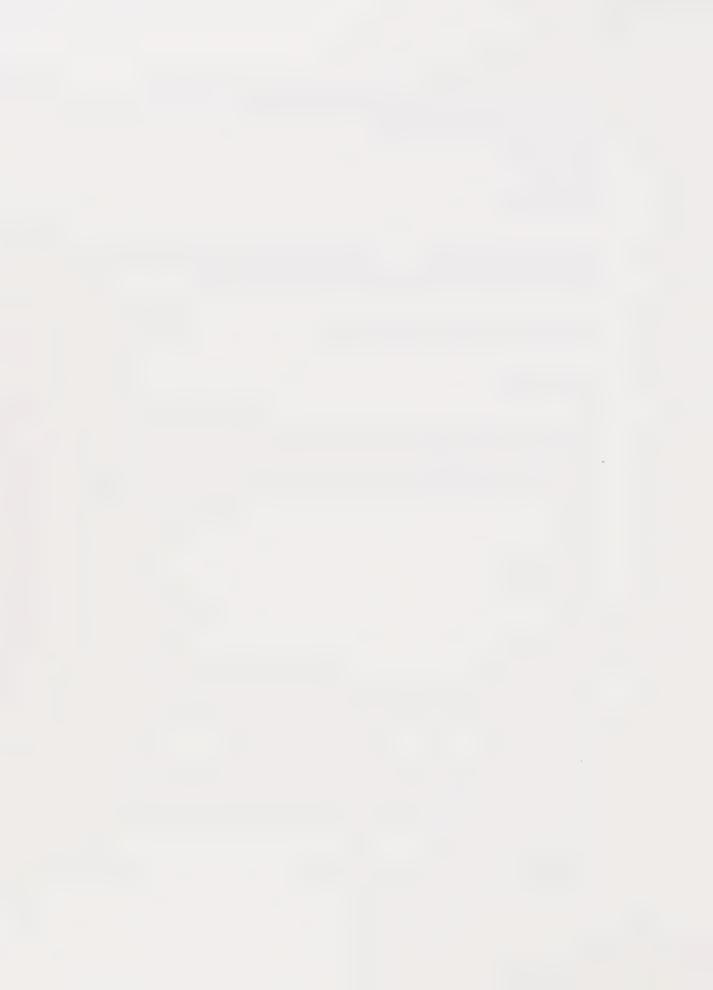
H-2 No difference.

H-3 Inconclusive. Minority tester was not shown a unit. Black tester was told a unit would be ready for occupancy "soon" while white tester was told a unit was available "now". Minority tester was told to come back with an appointment and to bring spouse and a money order for \$23.50 for the credit check. Majority tester was told the credit check was \$7.00 per adult. However, the minority tester, who was to arrive first, saw a note on the door saying manager was in a meeting, waited and returned the next day. Majority tester looked around and located the Assistant Mgr. who then showed her a unit and gave her the



information on the scheduled availability date. Although discrimination was clearly evident, different agents causes the test to be rated inconclusive.

- H-4 No difference.
- H-5 No difference.
- Majority tester was given five additional minutes in the interview. That tester was given a floor plan, rental rate sheet and agent recorded information onto a guest card.
- UC-2 Inconclusive. Minority tester given 30 extra minutes in the interview and shown different unit.
- UC-3 No difference.
- Minority tester was told of one less and altogether different unit coming up. That tester was also quoted a flat deposit amount regardless of whether it was a one or two bedroom unit. The majority tester was quoted a lesser amount for deposit for a one bedroom while a higher amount was quoted for a two bedroom unit.
- µC-5 No difference.
- UC-6 No difference.
- CV-1 No difference.
- CV-2 Majority tester was told about \$100 discount off of the first month's rent but minority tester was not told about the opportunity. Majority tester was also told of one more two bedroom unit as well as the availability dates.
- Majority tester was given the option of viewing either the downstairs or upstairs two bedroom unit and also told of two more available units while minority tester was told of only one available unit.
- CV-4 No difference,



- CV-5 Majority tester was told that a vacancy would be coming up on 7/1/95, given a business card, and was asked to call back at that time. Minority tester was told that there were no vacancies and that the agent had no business cards.
- CV-6 No difference.
- CV-7 No difference.
- N-1 Testers were shown different units. Minority tester was discouraged from renting because agent told of a train that comes three times during the day. The same agent told the majority tester that aside from the kids and railroad activity, the complex was "pretty quiet." Minority tester was given not a definite date as to the availability of the unit while the majority tester was given 7/1/95 as the date when the unit would be ready.
- N-2 Majority tester was made aware of a one year lease which would result in lower rent amounts while minority tester was not. Also, minority tester was not told about any one bedroom units which would have a lower rental amount while the majority tester was told of "two" one bedroom units which were available now.
- N-3 No difference.
- D-1 Majority tester was told of one more available unit as well as a waiting list. Minority tester wasn't given that information.
- D-2 Majority tester was given ten more minutes in the interview and minority tester was shown a unit which had a high rent amount.

 Majority tester was told that a "paid waiting list" would give an applicant higher priority while the minority tester was not given that information.
- SL-1 No difference.
- SL-2 No difference.
- UNSL-1 Minority and majority testers were shown altogether different units. Majority tester was told that a credit check was not rigid.



- UNSL-2 Minority tester was told of one less available unit. Majority tester was told of discount for timely rent payment while minority tester was not. Minority tester was quoted a higher deposit amount but a lesser amount was written on the business card while majority tester was quoted the lesser amount.
- UNSL-3 No difference.
- UNSL-4 No difference.
- UNSL-5 No difference.
- UNSL-6 Minority tester was told of one less unit and also shown different units. Majority tester was given manager's business card while minority tester was not.

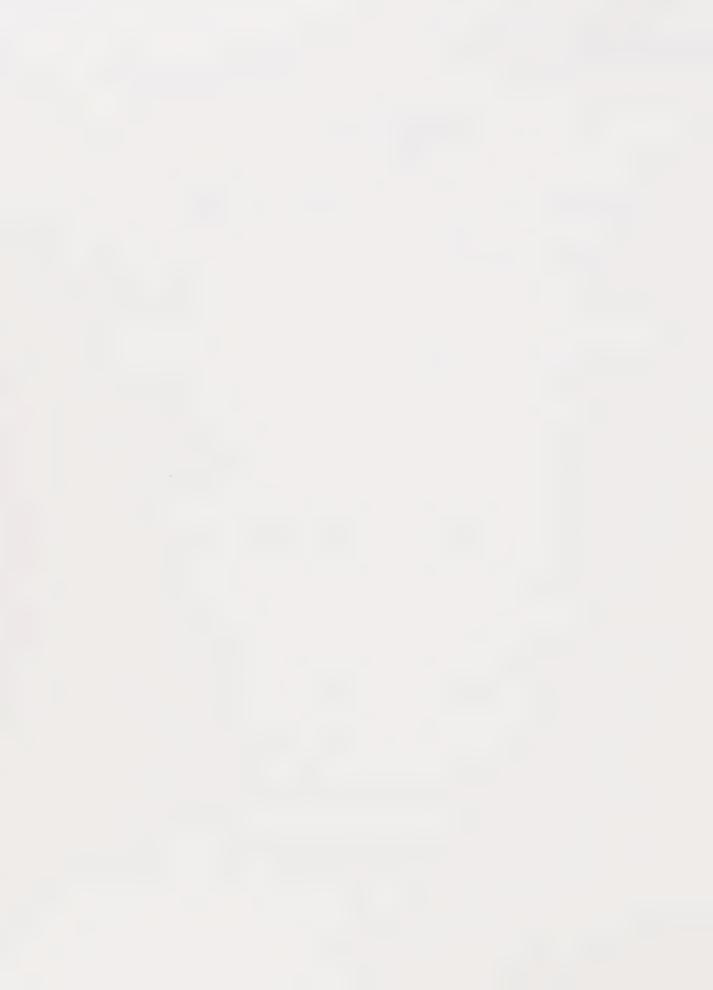
APPENDICES

Department of Fair Employment and Housing Test Report Form DFEH 110 (Temp. 8/82)

Control	#	
For Of	fice Use	Only

TEST REPORT FORM RENTALS

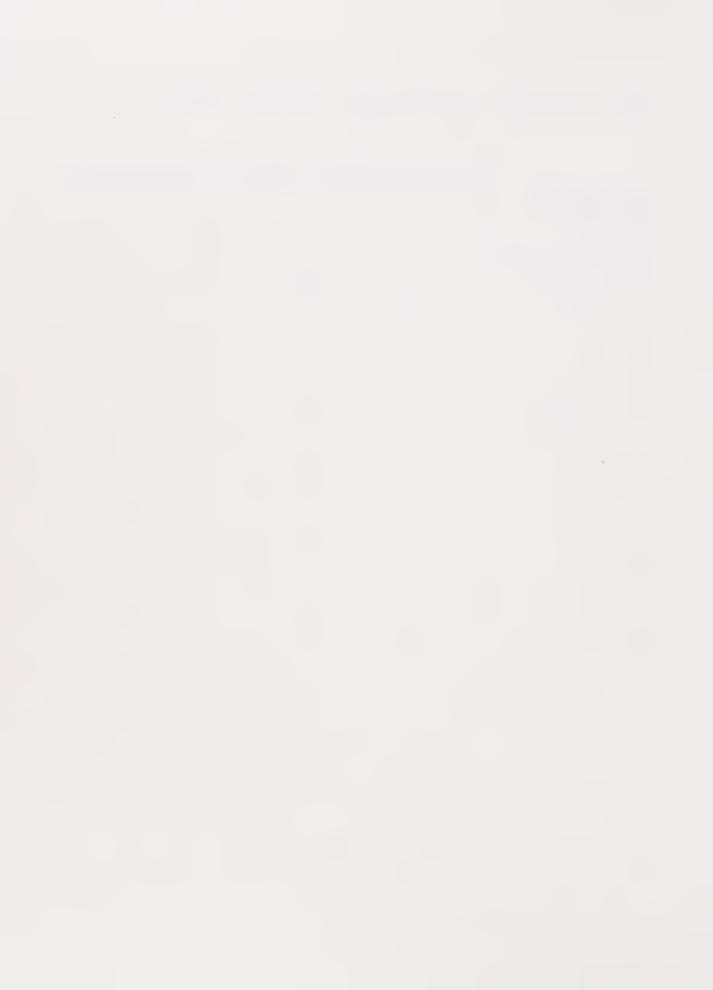
	ME OF TESTER Race Pho	ne
ld	dress	
me	me Used on Test (if different)	
d	dress of Property Visited No. o	f Units _
	1. THE INTERVIEW	
	, straphone and to inquire about an apartment!	
	Date and time of visit	
	Individual to whom you spoke	
	Description of person to whom you spoke: Sex Race	
	Age Height Hair Glasses	
	Function: Owner Agent Resident Manager	
	Maintenance Person Other	
	Description of rental office	
1	Was a fair housing poster on display?	
	Do you feel the agent treated you courteously?	
	(Specify)	



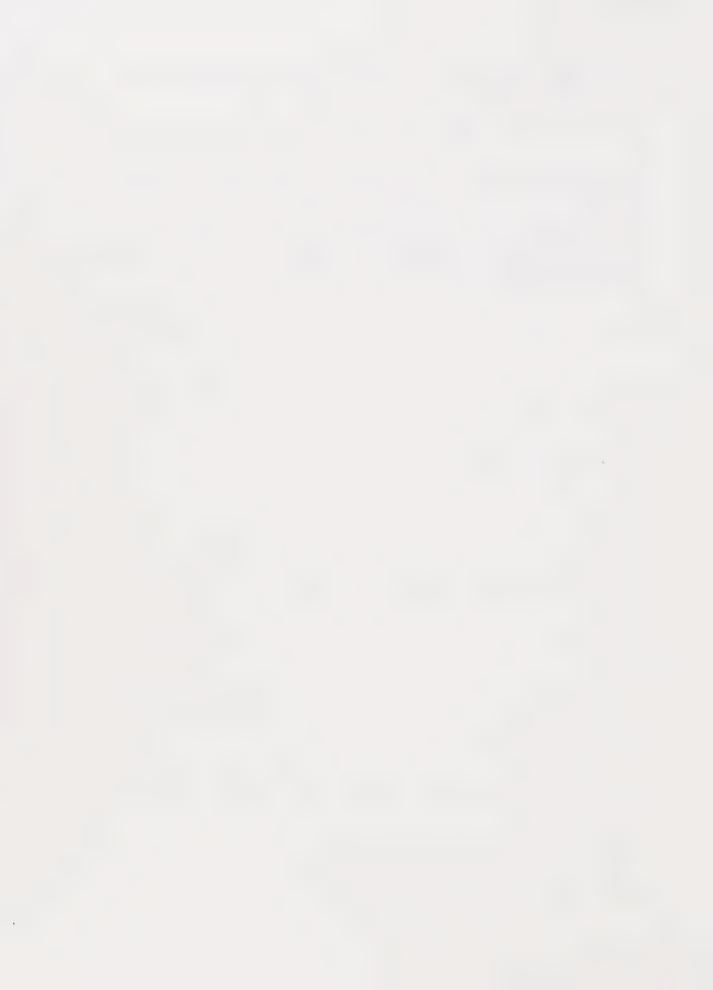
8.	Indicate	which of the following information was either requested by the
	agent or	volunteered by you, and what was discussed.

	Not Discussed	Requested by Agent	Volunteered by Tester	Information Given
Your Price Range			-,	THE STANGET OF CETT
for an Apartment Your Desired				
Occupany Date				
Your Marital Status				
The No. of Child-				
ren you have				
The Location				
you Desire				
Your Income				
Your				
Spouse's Income				
Any Pets you have				
Your Employment				
Your Spouse's				
Employment				
Your Debts				
Your Rental				
References				
Your Credit				
References				
Your Tele-				
Phone Number Your Current				
Address				
Other (Specify):				
Did the agent record a	any of the a	bove informa	tion?	
If yes, how was it red				
a) Standard For				
b) Application				
c) Other (Spec	ify)			

9.

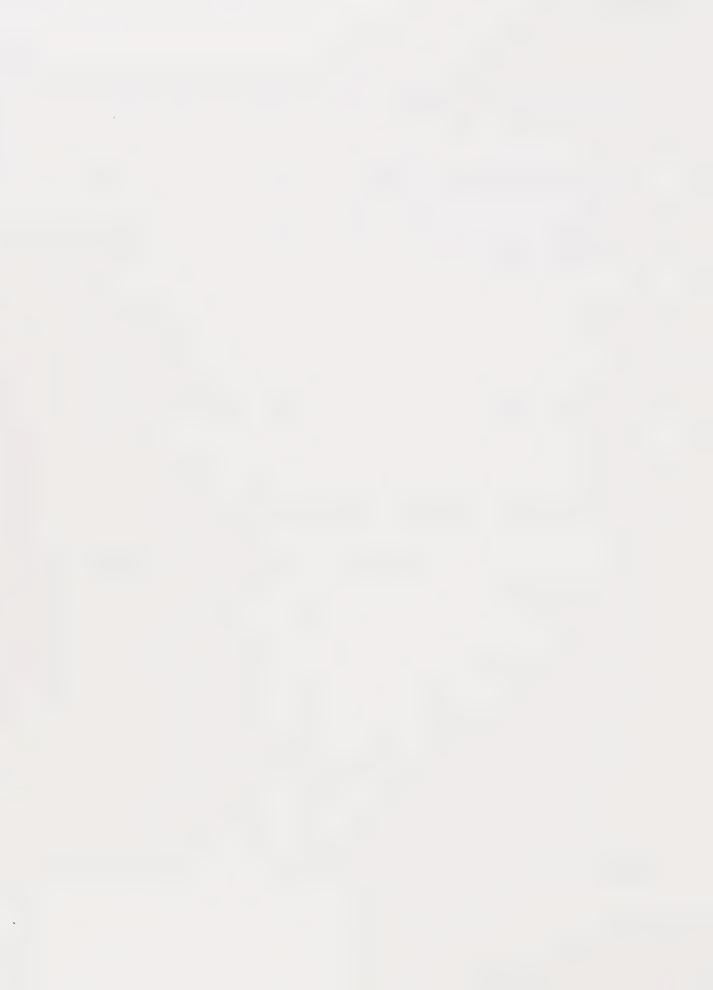


10.	Did the agent state at any time that you might be ineligible to rent an apartment?
	If yes, specify the reason given
11.	When you inquired about the availability of an apartment, what did the agent tell you? (Circle the appropriate response).
	a) An apartment was available immediately (specify number) b) An apartment would be available on (specify date) c) Not sure whether an apartment was available d) Nothing was available e) Other (specify)
12.	How many apartments in all were volunteered to you as serious possibilities?
13.	Were you invited to inspect these apartments on the inside? (Circle the appropriate response).
	a) Yes, all of them b) Yes, but only some of them (specify how many) c) No, but I was shown the model d) No, I was not invited to inspect any apartments
14.	How many apartments did you actually inspect?
15.	Did the agent accompany you to the apartment(s) inspected?
16.	If an apartment was not available, did the agent say a unit would become available. (Circle the appropriate response)
	a) Yes, voluntarily (describe when and what would become vacant).
	b) Yes, but only after I asked (describe when and what would become vacant).
	c) I forgot to inquire.d) Was told nothing was available in near future.
17.	Did the agent offer to put your name on a waiting list? (Circle the appropriate response).
	a) Yes, voluntarily b) Yes, but only after I asked about it c) No, because they do not keep a waiting list d) No, because units would be available e) Other (specify)

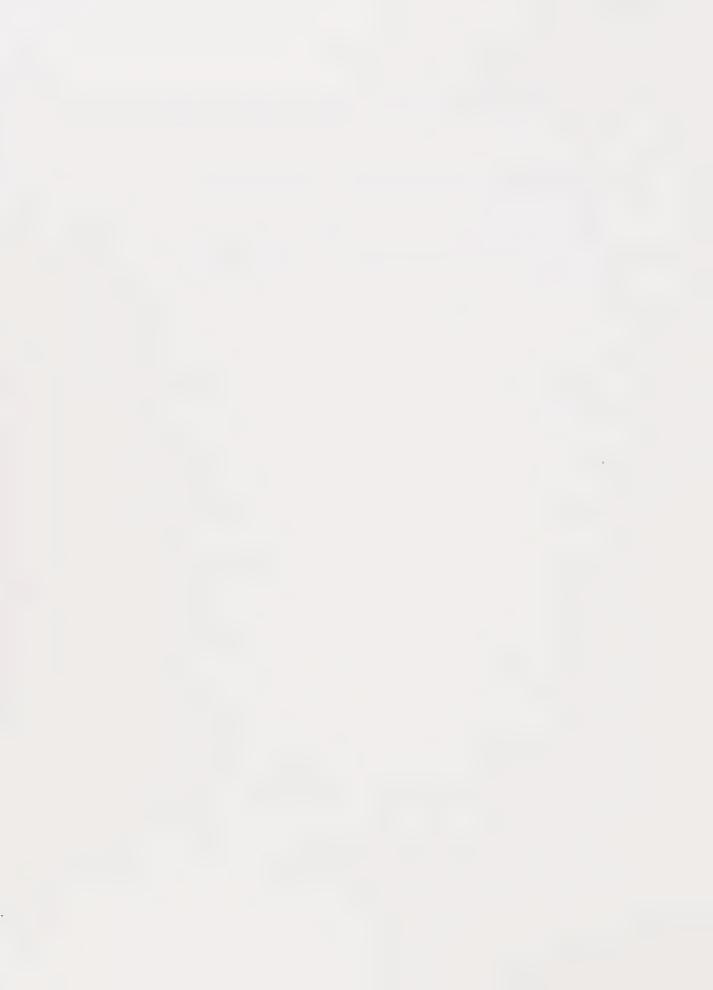


18.	It the agent offered to p	ut your name on	a waiting list, w	what kind of
19.	9. Did you fill out an application?			
	a) If so, did the agent b) Did you ask to?	invite you to? _		
20.	How much would the applic	ation fee be?		
21.	What did the agent say about a credit check?			
22.	Was security deposit info	rmation voluntee	red by agent?	
23.	What did the agent say ab	out a security d	eposit? (Specify	amount)
24.	Did the agent make any ra If "YES", or "NOT SURE",			
25.	For each apartment sugges information (if a list wa			
	A. Did you inspect the apartment?	First Apartment	Second Apartment	Third Apartment
	B. Address			
	C. Apartment number			
	D. Monthly rent			
	E. Utilities included			
	F. Number of bedrooms			
	G. Restrictions			
	H. Security deposit			
	I. When available			

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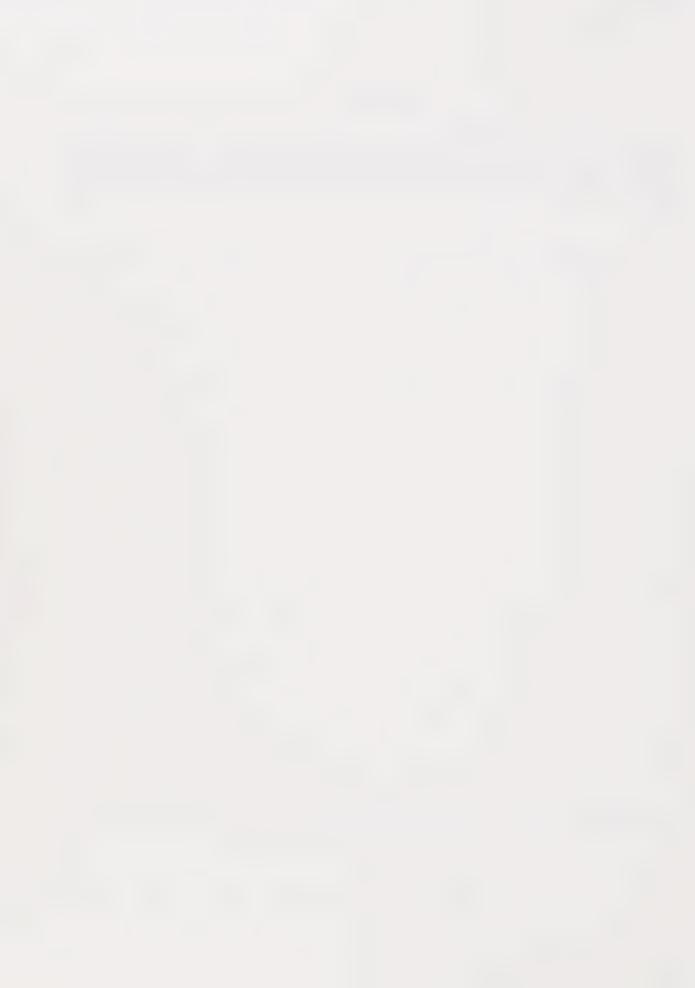
Specify comments L. Did the agent speak negatively about the apartment(s)? Specify comments Description of the neighborhood or complex Did the agent speak positively about the complex or neighborhood? Specify comments Did the agent speak negatively about the complex or neighborhood? Specify comments Did the agent speak negatively about the complex or neighborhood? Specify comments Did the agent mention anything about the lease requirements? If so, what did the agent say?	J.	Description of the apartment(s)
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Oid you say you wanted the apartment?		
If yes, what did the agent say?	Did	you say you wanted the apartment?
If yes, what did you say in response to the agent?		yos, what are the agent soy.
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	1	yes, what are you say in response to the agent.

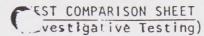


NARRATIVE

	Signature		Date
LEASE ATTACH ANY MATER ICKED UP IN THE OFFICE	IALS THAT WERE GIVEN TO , E.G., BUSINESS CARDS	YOU BY THE AGENT, FLOOR PLANS.	OR THAT YOU
LATER.		on the field for the	TENDER THIS TEST
BE USED TO HELP PUT ENDETAILS OF CONVERSATION	EWHERE IN THIS TESTING /ENTS AND CONVERSATION ON AND ADD ANYTHING WHI	INSTRUMENT FORM.	THIS SPACE SHOULD
PECORD ADSOLUTE DE LA PECORDA DE CONTRA DE LA PECORDA DE CONTRA DE LA PECORDA DE CONTRA DE LA PECORDA DE LA PECORD	EASE DESCRIBE ANY EXPER	IENCES WHICH YOU W	ERE NOT ABLE TO

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vestigative Testing)	

Address		Date Tested	
Debriefer			
Testers:			
* Compare tester assi	Protected gnment forms with report f	Orms to insure testers f	ollowed profile.
	(Minority)	(Majority)	
I tem:	Protected Tester:	Comparison Tester .	Difference:
Test Date			,
Time (In & Out)			
Person Spoken to	*		
(Name/Position)			
*******	************	```\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	**************
Total Units Available and Bedroom Size		·	
Unit #(s) and Dates(s) available			
# of Units inspected (Address, Apt. #)			
Waiting List			
*****	*********	********	******
Rent:	•		
Deposit:			
Appl. Fee			
Last Month Required (Narrative)	******	******	*****
Additional Information			





